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PATENT APPLICATION

ATTORNEY DOCKET NO. 10990665-1

IN THE

UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Rogelio Robles

Confirmation No.: 6814

Application No.: 09/887,306

Examiner: Cesar B. Paula

Filing Date: Jun. 22, 2001

Group Art Unit: 2178

Title: Document Production In A Distributed Environment

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
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TRANSMITTAL OF APPEAL BRIEFTransmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on Mar. 22, 2006.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

 (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below: 1st Month
\$120 2nd Month
\$450 3rd Month
\$1020 4th Month
\$1590 The extension fee has already been filed in this application. (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.Please charge to Deposit Account 08-2025 the sum of \$ 500. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed. I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, Alexandria, VA 22313-1450

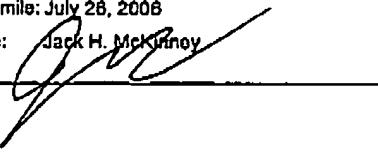
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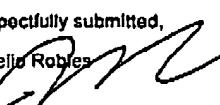
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Typed Name: Jack H. McKinney

Signature: 

Respectfully submitted,

Rogelio Robles

By: 

Jack H. McKinney

Attorney/Agent for Applicant(s)

Reg No.: 45,685

Date : July 26, 2006

Telephone : 208-433-1991

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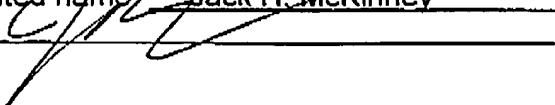
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**PATENT APPLICATION
DOCKET NO. 10990665-1**

**IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE**

INVENTOR(S): Rogelio Robles, et al.

SERIAL NO.: 09/887,306

GROUP ART UNIT: 2178

FILED: June 22, 2001

EXAMINER: Paula, Cesar B.

SUBJECT: DOCUMENT PRODUCTION IN A DISTRIBUTED ENVIRONMENT

APPELLANT'S/APPLICANT'S OPENING BRIEF

Opening Brief on Appeal
Serial No. 09/887,306

-1-

APPELLANTS/APPLICANTS' OPENING BRIEF ON APPEAL**1. REAL PARTY IN INTEREST.**

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holding, LLC.

2. RELATED APPEALS AND INTERFERENCES.

There are no other appeals or interferences known to Appellants, Appellants' legal representative or the Assignee which will affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

3. STATUS OF CLAIMS.

Claims 1-40 were originally filed in this application. Claims 6, 10, 25, 30, 32, 33, 38, and 40 have been cancelled during prosecution. Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 remain pending and stand rejected. All of the pending claims are appealed.

4. STATUS OF AMENDMENTS.

No amendments have been filed after the final action was entered. All previous amendments have been entered.

5. SUMMARY OF CLAIMED SUBJECT MATTER.

Claim 1 recites a method for managing electronic document production over a computer network. That method includes presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device. See, e.g., Specification paragraph [0039] and Fig. 10. A second user

interface is presented to the remote computing device where that second user interface has user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface. See, e.g., Specification paragraph [0039] and Fig. 10. The selected services and the captured production request are merged into a production plan which is delivered in a device specific format to one or more selected document production devices selected through the second user interface. See, e.g., Specification paragraph [0039] and Fig. 10.

Claim 9 recites a computer program product for managing electronic document production over a computer network. The product comprises a computer useable medium having computer readable instructions thereon. See, e.g., Specification paragraph [0038]. Those instructions are for presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device. See, e.g., Specification paragraph [0039] and Fig. 10. Those instructions are for presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface. See, e.g., Specification paragraph [0039] and Fig. 10. Those instructions are for merging the selected services and the captured production request into a production plan; and delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface. See, e.g., Specification paragraph [0039] and Fig. 10.

Claim 19 recites a system for managing production requests that comprises a production client and a production server. See, e.g., Specification paragraphs [0024] and [0025]. The production client includes a capture driver and an interface translator. See, e.g., Specification paragraph [0024]. The capture driver is operable to capture the production request. See, e.g.,

Specification paragraph [0024]. The interface translator is operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface. See, e.g., Specification paragraphs [0024] and [0039]. The production server is in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2. The production server includes a services engine and a production engine. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2. The services engine is operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2. The production engine is operable to deliver the captured production request to a production device or devices selected through the second user interface. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2.

Claim 29 recites a distributed document production system comprising a services engine and a production engine operating on one or more computing devices that are remote from a production client. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2. The services engine is operable to obtain a selection of one or more services for producing a production request captured by the production client, to automatically identify one or more, if any, production devices capable of providing the selected services, and to obtain a selection of one or more of the identified production devices from the production client. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2. The production engine

is operable to deliver the captured production request to a selected production device. See, e.g., Specification paragraphs [0025]-[0029] and Fig. 2.

6. GROUNDS FOR REJECTION TO BE REVIEWED.

A. Claims 1-5, 7-9, and 11-18 were rejected under 35 USC §103 as being unpatentable over US Pub 2001/0013947 to Van Der Linden.

B. Claims 19-24, 26-29, 31, 34-37, and 39 were rejected under 35 USC §103 as being unpatentable over USPN 6,477,589 issued to Suzuki in view of US Pub 2004/0148335 to Keeny.

7. ARGUMENT.

A. Ground For Rejection A – Claims 1-5, 7-9, and 11-18 were rejected under 35 USC §103 as being unpatentable over US Pub 2001/0013947 to Van Der Linden.

Claim 1 is directed to a method for managing electronic document production over a computer network and recites the following acts:

- presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;
- presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;
- merging the selected services and the captured production request into a production plan; and
- delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

Claim 1 recites a method that utilizes two user interfaces. The first is for selecting services. The second is for selecting production devices identified as being capable of providing services selected through the first user interface. Van Der Linden mentions nothing of presenting a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface.

Van Der Linden is directed to a method for electronically submitting documents to a reproduction center. Van Der Linden, Abstract. To that end a printer driver (16) is provided to generate a "temporary print file." Van Der Linden, [0038], [0039]. A "repro printer demon" (20) then causes the temporary print file to be transmitted to the reproduction center. Van Der Linden, [0040]. The reproduction center sends back a submission form (40). Van Der Linden, [0041]. The submission form (40) includes menus that allow a user to provide personal information and to select previously specified print options. Van Der Linden, [0042].

The submission form (40) includes a button (34) to submit personal information and selected print options to the reproduction center. Van Der Linden, [0045]. The submitted information is referred to as a job ticket and is associated with the temporary print file. Van Der Linden, [0052]. An operator at the reproduction center, using a software tool, then manually schedules a print job for the print file according to the corresponding job ticket. Van Der Linden, [0055]. The software tool presents the operator with an interface that lists selected print options so the operator can manually identify and assign the print job to a "print engine" that has the necessary capabilities. Van Der Linden, [0056].

The Examiner makes the following statement regarding the second user interface recited in Claim 1.

Moreover, Vanderlinden teaches the editing or changing of the submission form's pull-down menu to update functionalities available at the reproduction center, such as the adding a new printer to a reproduction center, whose capabilities are added to a pull-down menu for selecting the printer having the new functionality, as a result of the addition of a new printer capable of printing documents on transparent media. The updated information is placed, and displayed in the form's

pull-down menu using a browser - *presenting to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface* – (0016, 0041, 0051, 0059, fig.3).

To aid in illustrating the Examiner's misunderstanding, paragraphs [0016], [0041], [0051], and [0059] and Fig. 3 are reproduced below

[0016] The process steps on the side of the reproduction center are most conveniently performed by an appropriately programmed computer which will be termed a "print server". Then, from the viewpoint of the client user, the process of submitting a job to a reproduction center is quite comparable to a normal print command called up from a desktop application, with the print server playing the role of a virtual local printer, and the submission form popping up on the user's screen under the control of the print server replacing the conventional print dialog, but with the significant difference that the appearance of the submission form can change dynamically in response to changes in the functionality available in the reproduction center.

...

[0041] Concurrently with the transmission of the printer language document, the reproduction center sends back a piece of program code which is written for example in HTML (Hypertext Markup Language). This piece of program code, which is called a submission form description, is interpreted by the telecommunications software (e.g. web browser). As a result, a corresponding submission form 24 is displayed on the monitor screen of the client computer. This submission form 24, which may have the appearance shown in FIG. 3, allows the end user to interact with the reproduction center by entering information and commands into the submission form.

...

[0051] Since the submission form must only include the options that are available in the reproduction center, the submission form description 57 can be edited from the operator console 58 in case that the hardware equipment and hence the capabilities of the reproduction center should change. If, for example, a new printer is installed which is capable of printing on transparent overhead projector film, then the option "transparent" may be added to the pull-down menu 30 "paper", as shown in FIG. 3. Thus, the clients are always kept up to date with relation to the

capabilities of the reproduction center, without any need for updating the software installed on the client computers.

[0059] FIG. 4 shows the components, on the side of the reproduction center, of a reproduction system according to a modified embodiment, in which not only the job submission process but also the job handling is automated. Here, in addition to the job ticket store 54 and the document store 60 already described, a device capabilities store 66 is provided which stores, again in the form of a data base, the capabilities of all the printers 68 available in the reproduction center. The device capabilities store 66, which may be edited from the operator console 58, provides the necessary information enabling automatic update of the submission form description when the device capabilities change.

Fig. 3

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REPRO ORDER FORM

<p>Customer</p> <p>Name <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Company <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Department <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Email-adress <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>	<p>26</p> <p>26</p> <p>Phone <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Order-No. <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Password <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>		
<p>Print Options</p> <p>28</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Paper Format <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Paper <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>30</p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> </td> <td style="width: 50%; vertical-align: top;"> <p>Copies <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Color <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Finish <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> </td> </tr> </table>		<p>Paper Format <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Paper <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>30</p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>	<p>Copies <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Color <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Finish <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>
<p>Paper Format <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Paper <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>30</p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>	<p>Copies <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Color <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p>Finish <input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>		
<p>Delivery</p> <p>28</p> <p>28</p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p> <p><input style="width: 100%; height: 1.2em; border: 1px solid black; border-radius: 3px; margin-bottom: 5px;" type="text"/></p>			
<p>32</p> <p>34</p> <p>36</p> <p><input style="border: 1px solid black; border-radius: 15px; padding: 5px 15px; margin-right: 10px;" type="button" value="Preview"/></p> <p><input style="border: 1px solid black; border-radius: 15px; padding: 5px 15px; margin-right: 10px;" type="button" value="Submit"/></p> <p><input style="border: 1px solid black; border-radius: 15px; padding: 5px 15px;" type="button" value="Cancel"/></p>			

Fig. 3 illustrates a "submission form" user interface for selecting print options. It is noted that the user interface illustrated in Van Der Linden, Fig. 3 does NOT include any controls for selecting a production device let alone a production device identified as being capable of providing services selected through the first user interface."

Paragraph [0016] describes that "process steps" are performed "on the side of the reproduction center" are performed by a "print server." This print server is NOT a production client as it does not present the first and second user interfaces recited by Claim 19. The print server is simply responsible for sending a submission form to be displayed on a remote user's screen. Granted, the contents of the submission form are dependent upon the functionality available at the reproduction center. However, this simply means that Van Der Linden's submission form only includes controls for selecting services that are available at Van Der Linden's reproduction center.

Paragraph [0041] simply describes that as the reproduction center receives a printer language document from the remote user, the reproduction center sends the remote user a web page for displaying the submission form.

Paragraph [0051] describes that Van Der Lindens submission form MUST only include options available at the reproduction center. At the reproduction center, the "submission form description" can be manually edited from an "operator console" to reflect any changes of the capabilities of the reproduction center. The "submission form description" is simply an HTML file defining a web page for displaying the submission form. It is this HTML file that the reproduction center sends to the remote user.

Paragraph [0059] describes the reproduction center s including a "device capabilities store" that can be manually updated via Van Der Linden's operator console. The device capabilities store is a database containing the capabilities of all printers at the reproduction center. Using the device capabilities store, the submission form description describe in paragraph [0051] can be updated.

In paragraph [0051], Van Der Linden describes adding an option to a pull down menu of the submission form (24) shown in Fig. 3 above. That option relates to a

service provided by a newly added printer at a reproduction center. In short, the submission form contains options available for all of the printers at the reproduction center. The Examiner asserts that addition of a new option to Van Der Linden's submission form (24) indirectly allows a selection of a printer to print documents. The Examiner, however, ignores the fact that Van Der Linden teaches away from the claimed invention by requiring that a reproduction center operator or a "scheduler" at the reproduction center to identify and select a capable printer. See Van Der Linden, [0055] and [0060]. Van Der Linden's submission form (24) merely allows a user to select options that will be implemented by a printer that is subsequently selected by a reproduction center operator.

In other words, a printer is NOT selected through Van Der Linden's submission form directly or indirectly. Consequently Van Der Linden fails to teach or suggest a method that includes "presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface."

For at least these reasons, Claim 1 is patentable over Van Der Linden as are Claims 2-5, 7, and 8 which depend from Claim 1.

Claim 9 is directed to a computer program product for managing electronic document production over a computer network. The product comprising a computer useable medium having computer readable instructions for performing the method of Claim 1. For the same reasons Claim 1 is patentable, so are Claim 9 and Claims 11-18 which depend from Claim 9.

B. Ground For Rejection B – Claims 19-24, 26-29, 31, 34-37, and 39 were rejected under 35 USC §103 as being unpatentable over USPN 6,477,589 issued to Suzuki in view of US Pub 2004/0148335 to Keeny.

Claim 19 is directed to system for managing production requests and, as amended, recites the following elements:

1. a production client operable to receive a production request, the client comprising:
 - a. a capture driver operable to capture the production request; and
 - b. an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface;
2. a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services, the production server comprising:
 - a. a services engine operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and
 - b. a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface

Claim 19 recites a system that utilizes a production client that presents two user interfaces. The first is for selecting services and the second is for selecting production devices identified as being capable of providing services selected through the first user interface. The system also utilizes a production server that provides the production client with the first and second user interfaces. More specifically, the production server, after providing the first interface, receives selections made through the first interface to

then automatically identify production devices to include in the second user interface. In other words, the system recited in Claim 19 automatically generates a second user interface that identifies production devices that are capable of providing the specific services selected by a user through the first interface.

The Examiner asserts that Suzuki teaches a production client as recited by Claim 1 and that Keeney teaches a production server as recited by Claim 19. With respect to Suzuki, the Examiner contends that Suzuki, Fig. 1; col. 6, lines 37-67; and col. 19, lines 7-67 teaches an interface translator operable to present a first user interfaces having user accessible controls for selecting services for producing the production request. The figure and passages cited by the Examiner mention nothing of a user interface having user accessible controls for selecting services for producing a production request. They only indicate that a network printer can be used to print.

The Examiner contends that Suzuki, col. 19, lines 27-67 and col. 21, line 57 through col. 22, line 67 teaches an interface translator operable to present a second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface. The passages cited by the Examiner mention nothing of a user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface.

For at least these reasons Claim 19 and Claims 20-24 and 26-28, which depend from Claim 19, are patentable over Suzuki in view of Keeney.

Claim 29 is directed to a distributed document production system that includes a services engine and a production engine operating on one or more computing devices that are remote from a production client. The services engine is operable:

- to obtain a selection of one or more services for producing a production request captured by the production client;
- to automatically identify one or more, if any, production devices capable of providing the selected services; and

- to obtain a selection of one or more of the identified production devices from the production client.

The production engine is operable to deliver the captured production request to a selected production device.

Claim 29 recites a system that is configured to first obtain a selection of services for a production request and to then to automatically identify one or more, if any, production devices capable of providing the selected services, and to then obtain a selection of one or more of the identified production devices from the production client.

Rejecting Claim 29, the Examiner relies only on the teachings of Suzuki and makes the following statement:

Suzuki teaches displaying candidate devices, which meet a certain criteria, upon the selection of an option regarding the certain criteria on a client computer's software image -*production devices capable of providing the selected services, and obtain a selection of one or more of the identified production devices from the production client, and print options for performing printing-one or more services for producing a producing request, deliver the captured request to a selected production client-* (col. 19, lines 27-67, col. 21, lines 57-col. 22, line 67).

Furthermore, Suzuki teaches a window for selecting candidate devices, such as printers, meeting certain setting conditions, and a software automatically displaying candidates meeting the specified condition- *automatically identify one or more, if any, production devices capable of providing the selected services* (col. 19, lines 23-53, col. 20, lines 57-col. 22, line 67).

The cited passages from Suzuki mention the use of user interfaces to select a device where that device meets a criteria that is a printer as opposed to some other type of device. The passages mention nothing of the criteria relating to services selected for a production request. Furthermore, the passages mention nothing of a production client capturing a production request.

For at least these reasons, Claim 29 is clearly patentable over Van Der Linden as are Claims 31, 34-37, and 39 which depend from Claim 29.

Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,
Rogelio Robles, et al.

By 
Jack H. McKinney
Reg. No. 45,685

July 26, 2006

Opening Brief on Appeal
Serial No. 09/887,306

-14-

APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. (previously presented) A method for managing electronic document production over a computer network, the method comprising:

presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;

presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

merging the selected services and the captured production request into a production plan; and

delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

2. (previously presented) The method of Claim 1, further comprising identifying available services on the network, and generating the first user interface with user accessible controls for selecting the identified services.

3. (previously presented) The method of Claim 2, wherein the act of generating the first user interface includes generating the first user interface with user accessible controls for selecting services not available on the network.

4. (previously presented) The method of Claim 2, wherein the act of identifying available services includes querying devices present on the network.

5. (previously presented) The method of Claim 2, wherein the act of identifying available services includes querying a services database.

6. (cancelled)

7. (previously presented) The method of Claim 1, further comprising identifying document production devices capable of providing services selected through the first user interface and generating the second user interface with user accessible controls for selecting one or more, if any, of the identified document production devices.

8. (previously presented) The method of Claim 1, further comprising monitoring the status of delivered production plans.

9. (previously presented) A computer program product for managing electronic document production over a computer network, the product comprising a computer useable medium having computer readable instructions thereon for:

presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;

presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

merging the selected services and the captured production request into a production plan; and

delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

10. (cancelled)

11. (previously presented) The product of Claim 9, comprising further instructions for identifying services available on the network, and the instructions for presenting the first user interface comprise instructions for generating the first user interface with user accessible controls for selecting the identified services.

12. (previously presented) The product of Claim 11, wherein the instructions for presenting the first user interface comprise further instructions for generating the first user interface with user accessible controls for selecting services not available on the network.

13. (original) The product of Claim 11, wherein the instructions for identifying comprise instructions for querying devices present on the network.

14. (original) The product of Claim 11, wherein the instructions for identifying comprise instructions for querying a services database.

15. (original) The product of Claim 14, comprising further instructions for identifying services available on the network but not contained in the service database and updating the services database with the identified services.

16. (original) The product of Claim 15, further comprising identifying services not available on the network and not contained in the services database and updating the services database with the identified services.

17. (previously presented) The product of Claim 9, further comprising instructions for identifying document production devices capable of providing services selected through the first user interface and generating the second user interface with user accessible controls for selecting one or more, if any, of the identified document production devices.

18. (previously presented) The product of Claim 9, further comprising instructions for monitoring the production status of delivered production plans.

19. (previously presented) In a computer network, a system for managing production requests, comprising:

a production client operable to receive a production request, the client comprising:

a capture driver operable to capture the production request; and an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface;

a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services, the production server comprising:

a services engine operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and

a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface.

20. (previously presented) The system of Claim 19, wherein the capture driver is further operable to transform the production request into a selected format and to transfer the formatted production request to the production server.

21. (previously presented) The system of Claim 19, wherein the production server further comprises a web server for communicating with the client and the client interface translator is a web browser.

22. (previously presented) The system of Claim 19, wherein the services engine includes a services locator operable to identify services available on the network.

23. (previously presented) The system of Claim 22, wherein the production server further comprises a database of known services available on the network.

24. (original) The system of Claim 23, wherein the services locator is operable to identify available services by querying the database and by querying the document production devices present on the network.

25. (cancelled)

26. (original) The system of Claim 19, wherein the production engine includes a production queue.

27. (original) The system of Claim 26, wherein the production engine further includes a production manager in electronic communication with the production queue.

28. (original) The system of Claim 19, wherein the Client further comprises a server locator.

29. (previously presented) A distributed document production system comprising a services engine and a production engine operating on one or more computing devices that are remote from a production client, wherein:

the services engine is operable to obtain a selection of one or more services for producing a production request captured by the production client, to automatically identify one or more, if any, production devices capable of providing the selected services, and to obtain a selection of one or more of the identified production devices from the production client; and

the production engine is operable to deliver the captured production request to a selected production device.

30. (cancelled)

31. (previously presented) The document production system of Claim 29, wherein the production engine is operable to merge the selection of services and the captured production request into a production plan and deliver the production plan in a device specific format to one or more document production devices selected through the second user interface.

32. (cancelled)

33. (cancelled)

34. (previously presented) The document production system of Claim 29, further comprising a services database and wherein the services engine includes a services locator operable to locate services by querying the services database.

35. (previously presented) The document production system of Claim 34, wherein the production services locator is further operable to locate services by querying document production devices.

36. (original) The document production system of Claim 34, wherein the production server further includes an update service operable to update the services database with services available on the document production devices but not currently represented in the services database.

37. (original) The document production system of Claim 36, wherein the production engine includes drivers for the production devices and wherein the update service is further operable identify new devices and to update the device drivers with drivers for newly identified devices.

38. (cancelled)

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39. (previously presented) The document production system of Claim 29, wherein the production engine includes a production queue and a production manager in electronic communication with the production queue.

40. (cancelled)

Evidence Appendix

There is no extrinsic evidence to be considered in this Appeal. Therefore, no evidence is presented in this Appendix.

Related Proceedings Appendix

There are no related proceedings to be considered in this Appeal. Therefore, no such proceedings are identified in this Appendix.